

From: [Bill Jacobs](#)  
To: [Rose Kachadoorian](#)  
Cc: [Dan Peacock](#); [John Hebert](#)  
Subject: Re: ODA Concerns- possible SLN proposal: USDA APHIS Wildlife Services, EPA Reg. No. 56228-6  
Date: 04/26/2012 08:03 AM

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We will have to discuss these issues internally before we can provide much in the way of additional feedback. Here are a few very general comments.

Considering the crop mentioned and the geographic area, the ground squirrels causing problems might well be Belding's ground squirrels. That species is notoriously reluctant to accept grain baits. Prior to loss of above-ground uses of Strychnine and all rodenticidal uses of Sodium Fluoroacetate (Compound 1080), cabbage baits treated with either of those active ingredients were used (above-ground) to control Belding's ground squirrels in northern California and possibly in southern Oregon as well. (There was some sort of intrastate 1080 product registered for use in Klamath County many years ago, if memory serves.)

Alfalfa growers in Modoc and Siskiyou Counties, CA, were not pleased by the loss of availability of Strychnine and 1080 for use on cabbage baits. Subsequently, there have been various other methods tried in CA to control Bending's ground squirrels. These methods have included large-scale exclusion (with some success, at least experimentally), trapping, designated "squirrel-shoot" days, and other approaches. There might have been some experimental work using cabbage baits treated with anticoagulants or other rodenticides.

Zinc Phosphide might not be a good choice of compound to use on cabbage baits. In the presence of moisture, especially acidic moisture, Zinc Phosphide evolves toxic Phosphine gas. (When grain baits are eaten, that occurs in the victim's stomach and is the cause of whatever illness or mortality the animal experiences.) At this point it seems like it would be useful to inquire of APHIS's research personnel regarding whether they have conducted any experiments with Zinc Phosphide-treated cabbage baits and how those experiments turned out.

▼ Rose Kachadoorian ---04/25/2012 08:10:57 PM---I know that you aren't handling SLNs, but I need some help from experts. There is an issue that firs

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Date: 04/25/2012 08:10 PM  
Subject: ODA Concerns- possible SLN proposal: USDA APHIS Wildlife Services, EPA Reg. No. 56228-6

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I know that you aren't handling SLNs, but I need some help from experts.

There is an issue that first started (at least for us) when we received an email from a county agent in Oregon. See his email below.

Essentially, there are alfalfa growers in a county (not far from NV) who have significant problems with ground squirrels, and who have been unsuccessful in

controlling populations using grain based zinc phosphide.

USDA APHIS Wildlife Services at first proposed that they mix EPA Reg. No. 56228-6 with cabbage pieces/veg. oil and broadcast apply it above-ground to alfalfa. The Assistant State Director wanted to know why this could not be a 2ee; and also wanted to know the differences between a 2ee's and SLNs.

But I told them that: (1) Ground Squirrels are not a listed pest under alfalfa and that rodenticide labels were pest specific), (2) that the label specifically indicates under alfalfa to "use baits made from wheat." (3) that the tolerances were based on a uniform distribution of zinc phosphide, not concentrated amounts of ZnP on cabbage pieces, and (4) that Harney county also has a large wildlife preserve and steps would need to be taken to protect wildlife, particularly water fowl (the person I was speaking to is the Assistant State Director and seemed unaware of the 187,000 acre refuge).

If you want to read about the refuge -

<https://www.federalregister.gov/articles/2012/03/05/2012-5297/malheur-national-wildlife-refuge-harney-county-or-draft-comprehensive-conservation-plan-and-draft> .

I asked why couldn't they place the bait below ground in the holes, and Wildlife Services said that ground squirrels won't eat it if it is placed down in the holes (I am not sure if I believe this).

I had to remind Wildlife Services that they could not exceed the rate of 0.2 lbs of a.i./acre per application. They were focused on maximum amount that could be applied per year. Also, there was a brief mention of distributing product directly to growers (immediately prior to me becoming unglued (but my boss reminded me that there was no violation)).

Any strychnine SLNs in Oregon are out of the question (significant concerns associated with secondary poisoning). But what are your thoughts on the cabbage/ZnP baits. What are your thoughts about below-ground vs. above ground (I plan to ask some professional applicators).

Also, I was met with a somewhat hostile reaction when I said that rodenticide labels were pest specific, and was told that no one knew that, and they wanted something in writing from EPA. Can you assist me?

The county agent asked a good question, "What exactly does this mean in terms of availability of the product when APHIS is listed as the registrant? " According to my supervisor, it would be legal for APHIS to directly distribute product as long as they had a dealers license, and the grower had a pesticide applicator's license. What are your thoughts and EPA's intent?

Thank you

Rose

On Mar 19, 2012, at 3:01 PM, Johnson, Dustin wrote:

Hi ,

I've had a greater than normal number of alfalfa growers ask me about control methods for the Belding ground squirrel this year. Many of which have already tried any of the methods that I might recommend. I had two growers submit a letter to me indicating they have tried a Rodenator propane gun, a Perc carbon monoxide injector, anticoagulants in bait stations, shooting, and zinc phosphide treated grains by broadcasting, hand baiting, and in bait stations. All of these methods have yielded unsatisfactory results. In fact, despite using these methods, alfalfa growers have indicated that they are experiencing at least ½ ton reductions in yield, losses in quality and prices due to dirt contamination in hay, and increased incidence of equipment breakdown. These conditions directly or indirectly caused by ground squirrels have become a great financial burden to growers in the area. Growers have been asking me to check into how to go about getting a special registration for using strychnine products for ground squirrel control. Specifically, I've had growers refer to the Special Local Need Registration for strychnine alkaloid paste (NV-830009) that was done in Nevada for ground squirrel control. Apparently, growers have been very successful using strychnine cabbage baits placed down in burrow openings (see attached proceedings). Is such a Special Local Need Registration a possibility in Oregon? If so, who should initiate the process and what exactly is involved in the process?

Also, the attached proceedings describes acceptable success using zinc phosphide cabbage baits. Obviously, use of cabbage baits requires an applicator to mix a zinc phosphide concentrate with chopped cabbage. A search of the Pesticide Information Center returned one 63.2% zinc phosphide concentrate product (EPA # 56228-6) registered for use in Oregon. However, the registrant listed for the product is USDA-APHIS. What exactly does this mean in terms of availability of the product when APHIS is listed as the registrant? In other words, are zinc phosphide cabbage baits an option for controlling ground squirrels in Oregon?

Thanks in advance for any information you might be able to provide. I also appreciate your patience with what may seem like some fairly rudimentary questions.